

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION**

<b>SHANTA BROWN, <i>et al</i>,</b>	)	
<b><i>Plaintiffs</i></b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 6:23-cv-00054</b>
	)	
<b>CITY OF LYNCHBURG, <i>et al</i>,</b>	)	
<b><i>Defendants.</i></b>	)	

**PLAINTIFFS' RULE 26(a)(3) DISCLOSURES**

Plaintiffs Shanta Brown and Aquasha Sandidge City (collectively, the "Plaintiffs"), by counsel, hereby make the following disclosures concerning exhibits and witnesses for trial:

**I. WITNESSES**

A. The Plaintiffs intend to call the following witnesses at the trial in person:

1. Plaintiffs Shanta Brown and Aquasha Sandidge to testify to the incident at issue in the case and the damages they suffered.
2. Defendants Seth Reed, Zachary Miller and Robbin Miller (in-person and by deposition) to testify concerning the incident at issue in the case.

B. If the need arises, the Defendants may call the following witnesses at trial, in person:

1. Terron Pannell, 1010 Clay Street, Lynchburg, VA, to testify concerning the incident at issue in the case.

C. The Plaintiffs reserve the right to call any persons identified in discovery responses or witness disclosures about whom the Defendants have not objected, including the right to present such witness' testimony through their depositions.

D. The Plaintiffs reserve the right to call any witnesses necessary to impeach or to rebut testimony or other evidence offered by the Defendants

E. The Plaintiffs reserve the right to call impeachment or rebuttal witnesses not included on this list.

**II. EXHIBITS**

A. The Plaintiffs intend to offer the following as exhibits at trial:

1. Bodycam video recording from Zachary Miller on the date of the incident at issue in the case. (Plaintiff\_0001)

2. Dashcam video from Seth Reed's patrol vehicle on the date of the incident at issue in the case. (Plaintiff\_0002)
3. Bodycam video from Seth Reed on the date of the incident at issue in the case. (Plaintiff\_0003)
4. Audio recording of Shanta Brown's criminal jury trial in the Lynchburg Circuit Court. (Plaintiff\_0004)
5. Warrants charging Shanta Brown and Aquasha Sandidge with crimes alleged to have occurred during the incident at issue in this case. (Plaintiff\_0005)
6. Hire letter from Buckingham Correctional Center dated August 3, 2017 notifying Shanta Brown of her employment as a Correctional Officer. (Plaintiff\_0006)
7. Notice of termination of employment of Shanta Brown by the Virginia Department of Corrections (Form 129-01-004) issued on May 19, 2021. (Plaintiff\_0007)
8. Shanta Brown's 2019 W2 form from Buckingham Correctional Center. (Plaintiff\_0008)
9. Virginia Department of Corrections Due Process Notification dated March 29, 2021. (Plaintiff\_0009)
10. Virginia Department of Corrections letter dated June 22, 2021 notifying Shanta Brown of recoupment of \$1,385.25. (Plaintiff\_0010)

B. If the need arises, the Plaintiffs may offer the following exhibits at trial:

1. Any exhibits identified by the Defendants during discovery or pre-trial disclosures.
2. Any exhibits offered by the Defendants during trial.

C. The Plaintiffs reserve the right to use any exhibits identified in discovery or by the Plaintiffs as well as the right to introduce other documents as necessary for impeachment and rebuttal at trial.

### **III. DEPOSITIONS**

The Plaintiffs reserve the right to read the transcript of the designated portions of the following deposition(s):

Witness/Deponent Designation

Seth Reed:

18:15-19:23  
25:20-25:25  
29:8-30:11  
36:4-41:3  
42:10-44:1

Zachary Miller:

16:12-14  
20:23-21:15  
44:15-45:5  
58:7-60:10  
72:13-21  
73:18-74:2  
75:1-77:14  
78:17-80:18  
81:9-20  
94:22-95-12

Robbin Miller:

17:5-19:6

Respectfully submitted,

SHANTA BROWN and AQUASHA SANDIDGE

By /s/ M. Paul Valois

M. Paul Valois (VSB 72326)

JAMES RIVER LEGAL ASSOCIATES

7601 Timberlake Road

Lynchburg, VA 24502

T: 434-845-4529

F: 434-845-8536

Email: mvalois@vbclegal.com

*Counsel for Plaintiffs*

#### CERTIFICATE OF SERVICE

I do hereby certify that on this 13th day of January, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ M. Paul Valois